

# JUDGE KEENAN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA

: INDICTMENT

- v. -

: 11 Cr. CRIM 897

MANSSOR ARBABSIAR,

:

a/k/a "Mansour Arbabsiar," and

:

GHOLAM SHAKURI,

:

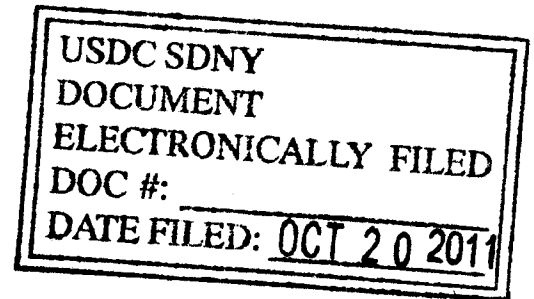
a/k/a "Ali Gholam Shakuri,"

Defendants.

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COUNT ONE



## CONSPIRACY TO MURDER A FOREIGN OFFICIAL

The Grand Jury charges:

1. From at least in or about the spring of 2011, up to and including in or about October 2011, in the Southern District of New York and elsewhere, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated and agreed together and with each other to violate Section 1116 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, would kill a foreign official, to wit, ARBABSIAR and SHAKURI agreed with each other and with others to kill the Ambassador to the United States of Saudi Arabia, while the

Ambassador was in the United States.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about August 1, 2011, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, caused an overseas wire transfer of approximately \$49,960 to be sent by a foreign entity from a bank located in a foreign country to an undercover bank account (the "UC Bank Account") maintained by the Federal Bureau of Investigation. Before reaching the UC Bank Account, the funds were transferred through a bank in Manhattan, New York.

b. On or about August 9, 2011, MANSSOR ARBABSIAR, the defendant, caused an overseas wire transfer of approximately \$49,960 to be sent by a foreign entity from a bank located in a foreign country to the UC Bank Account. Before reaching the UC Bank Account, the funds were transferred through a bank in Manhattan, New York.

c. In or about the spring of 2011, GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendant, provided thousands of dollars to MANSSOR ARBABSIAR, the defendant, in Iran to pay for expenses related to furthering the plot to kill the

Ambassador to the United States of Saudi Arabia.

(Title 18, United States Code, Section 1117.)

COUNT TWO

FOREIGN TRAVEL AND USE OF INTERSTATE AND FOREIGN COMMERCE  
FACILITIES IN THE COMMISSION OF MURDER-FOR-HIRE

The Grand Jury further charges:

4. From at least in or about the spring of 2011, up to and including September 29, 2011, in the Southern District of New York and elsewhere, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," the defendant, willfully and knowingly traveled in foreign commerce and used, and caused another to use, a facility of interstate and foreign commerce, to wit, bank wire transfers to an account in the United States from foreign entities, with the intent that a murder be committed in violation of the laws of the United States, to wit, Title 18, United States Code, Section 1116, as consideration for the receipt of, and as consideration for a promise and agreement to pay anything of pecuniary value, as those terms are defined in Title 18, United States Code, Section 1958(b), to wit, ARBABSIAR caused to be wired approximately \$100,000 into the United States, as partial consideration for the murder of the Ambassador to the United States of Saudi Arabia.

(Title 18, United States Code, Sections 1958 and 2.)

COUNT THREE

CONSPIRACY TO ENGAGE IN FOREIGN TRAVEL AND USE INTERSTATE AND  
FOREIGN COMMERCE FACILITIES IN THE COMMISSION OF MURDER-FOR-HIRE

The Grand Jury further charges:

5. From at least in or about the spring of 2011, up to and including in or about October 2011, in the Southern District of New York and elsewhere, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated and agreed together and with each other to violate Title 18, United States Code, Section 1958.

6. It was a part and an object of the conspiracy that MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, would and did travel in foreign commerce, cause another to travel in foreign commerce, and use the facilities of interstate and foreign commerce, to wit, bank wire transfers to an account in the United States from foreign entities, with the intent that a murder be committed in violation of the laws the United States, to wit, Title 18, United States Code, Section 1116, as consideration for the receipt of, and as consideration for a promise and agreement to pay anything of pecuniary value, to wit, ARBABSIAR, SHAKURI, and others known and unknown, agreed that \$100,000 would be wired into the United States as partial

consideration for the murder of the Ambassador to the United States of Saudi Arabia.

Overt Acts

7. In furtherance of the conspiracy and to effect the illegal object thereof, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, committed in the Southern District of New York and elsewhere, the acts set forth in Paragraph 3 above.

(Title 18, United States Code, Section 1958.)

COUNT FOUR

CONSPIRACY TO USE A WEAPON OF MASS DESTRUCTION

The Grand Jury further charges:

8. From at least in or about the spring of 2011, up to and including in or about October 2011, in the Southern District of New York and elsewhere, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, without lawful authority, willfully and knowingly combined, conspired, confederated and agreed together and with each other to violate Title 18, United States Code, Section 2332a(a)(2)(A) and (C).

9. It was a part and an object of the conspiracy that MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and

unknown, would use a weapon of mass destruction, namely, a destructive device as that term is defined in Title 18, United States Code, Section 921, against a person within the United States, where a facility of interstate and foreign commerce was used in furtherance of the offense, to wit, bank wire transfers to an account in the United States from foreign entities, and where a perpetrator of the offense traveled in foreign commerce in furtherance of the offense, to wit, ARBABSIAR and SHAKURI agreed with each other and with others to use an explosive device against the Ambassador to the United States of Saudi Arabia.

Overt Acts

10. In furtherance of the conspiracy and to effect the illegal object thereof, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, committed in the Southern District of New York and elsewhere, the acts set forth in Paragraph 3 above.

(Title 18, United States Code, Section 2332a(a)(2)(A) and (C).)

COUNT FIVE

CONSPIRACY TO COMMIT AN ACT OF TERRORISM  
TRANSCENDING NATIONAL BOUNDARIES

The Grand Jury further charges:

11. From at least in or about the spring of 2011, up to and including in or about October 2011, in the Southern District of New York and elsewhere, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated and agreed together and with each other to violate Title 18, United States Code, Sections 2332b(a)(1)(A), (a)(1)(B), (b)(1)(A) and (b)(1)(B).

12. It was a part and an object of the conspiracy that MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, would kill and maim persons within the United States and would create a substantial risk of serious bodily injury to others by destroying and damaging structures, conveyances and other real and personal property within the United States, in violation of the laws of the United States, including Title 18, United States Code, Sections 1116 and 1117, where interstate and foreign commerce is used in furtherance of the offense, to wit, bank wire transfers to an account in the United States from foreign entities, and where the offense would have obstructed,

delayed and affected interstate commerce had it been consummated, to wit, ARBABSIAR and SHAKURI, during meetings outside the United States, agreed with each other and with others to kill the Ambassador to the United States of Saudi Arabia, while the Ambassador was in the United States.

#### Overt Acts

13. In furtherance of the conspiracy and to effect the illegal object thereof, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, and others known and unknown, committed in the Southern District of New York and elsewhere, the acts set forth in Paragraph 3 above.

(Title 18, United States Code, Section 2332b(a)(1)(A), (a)(1)(B), (a)(2), (b)(1)(A), (b)(1)(B).)

#### FORFEITURE ALLEGATION

14. As a result of planning and perpetrating the Federal crimes of terrorism against the United States, citizens and residents of the United States, and their property, alleged in Counts One, Four, and Five of this Indictment, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(G) and 2332b(g)(5), and Title 28, United States Code, Section 2461:

a. all right, title, and interest in all assets,



foreign and domestic;

- b. all right, title and interest in all assets, foreign and domestic, acquired and maintained with the intent and for the purpose of supporting, planning, conducting, and concealing a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property; and
- c. all right, title and interest in all assets, foreign and domestic, derived from, involved in, and used and intended to be used to commit a Federal crime of terrorism against the United States, citizens and residents of the United States, and their property;

including, but not limited to, a sum of money representing the value of the property described above as being subject to forfeiture.

(Title 18, United States Code, Section 981(a)(1)(G) and 2332b(g)(5) and Title 28, United States Code, Section 2461.)

15. As a result of committing one or more of the offenses alleged in Counts Two and Three of this Indictment, MANSSOR ARBABSIAR, a/k/a "Mansour Arbabsiar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses.

Substitute Asset Provision


16. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and 28 U.S.C. 2461(c) to seek forfeiture of any other property of MANSSOR ARBABSAR, a/k/a "Mansour Arbabsar," and GHOLAM SHAKURI, a/k/a "Ali Gholam Shakuri," the defendants, up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853  
Title 28, United States Code, Section 2461)

  
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FOREPERSON

  
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PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v -

MANSSOR ARBABSIAR,  
a/k/a "Mansour Arbabsiar,"  
GHOLAM SHAKURI,  
a/k/a "Ali Gholam Shakuri,"

Defendants.

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INDICTMENT

18 U.S.C. §§ 2, 1117, 1958,  
2332a, 2332b

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PREET BHARARA  
United States Attorney.

  
Foreperson

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10-20-11 Filed Indictment A/Wissard. Case assigned  
to Judge Keenan  
Pitman  
U.S.M.S.